

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN  
DISASTER SITE LITIGATION

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DAVID REYNOLDS AND KATHERINE REYNOLDS,

Plaintiff(s), Index No.: 07CV3446

-against-

**NOTICE OF ADOPTION**

**1:21-MC-00102-AKH**

ALAN KASMAN DBA KASCO, AMERICAN  
EXPRESS BANK, LTD, AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS TRAVEL  
RELATED SERVICES COMPANY, INC.,  
AMERICAN STOCK EXCHANGE CLEARING  
LLC, AMERICAN STOCK EXCHANGE LLC,  
AMERICAN STOCK EXCHANGE REALTY  
ASSOCIATES LLC, AMEXCOMMODITIES  
LLC, AMEX INTERNATIONAL INC., AMEX  
INTERNATIONAL LLC, AMEX SEAT OWNERS  
ASSOCIATION, INC., AMEX SPECIALISTS  
ASSOCIATION, INC., ANN TAYLOR STORES  
CORPORATION, BANKERS TRUST  
COMPANY, BATTERY PARK CITY  
AUTHORITY, BFP TOWER C CO. LLC., BFP  
TOWER C MM LLC., BLACKMON-MOORINGSTEAMATIC  
CATASTOPHE, INC. D/B/A BMS  
CAT, BROOKFIELD FINANCIAL PROPERTIES,  
INC., BROOKFIELD FINANCIAL PROPERTIES,  
LP, BROOKFIELD PARTNERS, LP,  
BROOKFIELD PROPERTIES CORPORATION,  
BROOKFIELD PROPERTIES HOLDINGS INC.,  
BTPRIVATE CLIENTS CORP., DEUTSCHE  
BANK TRUST COMPANY, DEUTSCHE BANK  
TRUST COMPANY AMERICAS, DEUTSCHE  
BANK TRUST CORPORATION, ENVIROTECH  
CLEAN AIR, INC., FGP 90 WEST STREET INC.,  
GPS ENVIRONMENTAL CONSULTANTS, INC.,  
HILLMAN ENVIRONMENTAL GROUP, LLC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY,  
INC., KASCO RESTORATION SERVICES CO.,  
KIBEL COMPANIES, LEHMAN BROTHERS  
HOLDINGS INC., LEHMAN BROTHERS, INC.,  
LEHMAN COMMERCIAL PAPER, INC.,  
LIBERTY STREET REALTY, MCCLIER  
CORPORATION, MERRILL LYNCH & CO,

INC., NATIONALASSOCIATION OF  
SECURITIES DEALERS, INC., NEW YORK  
CITY ECONOMIC DEVELOPMENT  
CORPORATION, NEW YORK CITY  
INDUSTRIAL DEVELOPMENT AGENCY, NEW  
YORK CITY INDUSTRIAL DEVELOPMENT  
CORPORATION, NOMURA HOLDING  
AMERICA, INC., NOMURA SECURITIES  
INTERNATIONAL, INC., STRUCTURE TONE  
(UK), INC., STRUCTURE TONE GLOBAL  
SERVICES, INC., THE BANK OF NEW YORK  
TRUST COMPANY NA, THE NASDAQ STOCK  
MARKET, INC., TISHMAN INTERIORS  
CORPORATION, TOSCORP INC., TRAMMELL  
CROW COMPANY, TRAMMELL CROW  
CORPORATE SERVICES, INC., TUCKER  
ANTHONY, INC., WESTON SOLUTIONS, INC.,  
WFP RETAIL CO. G.P. CORP., WFP RETAIL  
CO. L.P., WFP TOWER A CO., WFP TOWER A  
CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP  
TOWER B CO. G.P. CORP., WFP TOWER B  
HOLDING CO., LP, AND WFP TOWER B. CO.,  
L.P., ET AL,

Defendant(s).

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C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York  
September 11, 2007

Yours, etc.,

**SAM ROSMARIN, PLLC**



By: \_\_\_\_\_  
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**SERVICE RIDER**

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**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the  
**SERVICE RIDER**



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Cristina A. Villani

Sworn to before me this  
11th day of September 2007



Charlene S. Rogers  
Notary Public  
No. 01RO 4703494  
Qualified in Westchester County  
Commission Expires 11/30/09